

**BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Promote Policy
and Program Coordination and Integration in
Electric Utility Resource Planning.

Rulemaking 04-04-003
(Filed April 1, 2004)

Order Instituting Rulemaking to Promote
Consistency in Methodology and Input
Assumptions in Commission Applications of
Short-run and Long-run Avoided Costs,
Including Pricing for Qualifying Facilities.

Rulemaking 04-04-025
(Filed April 22, 2004)

**REPLY COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
ON PROPOSED DECISION OF ALJ HALLIGAN**

Nancy Saracino, General Counsel
Sidney M. Davies, Assistant General Counsel
Stacie L. Ford, Associate Counsel
California Independent System Operator
151 Blue Ravine Road
Folsom, CA 95630
Telephone: 916-351-4400
Facsimile: 916-351-2350

Attorneys for the
**California Independent System
Operator Corporation**

Dated: June 4, 2007

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Pursuant to Rule 14.3 (d) of this Commission's Rules of Practice and Procedure and Administrative Law Judge (ALJ) Minkin's June 1, 2007 ruling extending the time to file reply comments to June 4, 2007, the California Independent System Operator Corporation (CAISO) respectfully submits its reply comments on ALJ Halligan's proposed "Opinion on Future Policy and Pricing for Qualifying Facilities" mailed on April 24, 2007 (Proposed Decision).

I. INTRODUCTION

The CAISO's participation in this proceeding has been limited to the issue of the applicability of the CAISO Tariff to Qualifying Facilities (QF). Specifically, the CAISO urged the Commission in this proceeding, as a general matter, to require QFs not subject to grandfathered power purchase agreements (PPAs) under the Public Utility Regulatory Policies Act of 1978 (PURPA) to comply with the CAISO Tariff. Specifically, the CAISO urged the Commission to require new or existing QFs proposing to interconnect

to the CAISO Controlled Grid, or upgrade existing interconnections to the CAISO Controlled Grid, to comply with CAISO's interconnection policies as set forth in the CAISO Tariff. In addition, the CAISO urged the Commission to require QFs entering into new PURPA PPAs to comply with the CAISO Tariff. The CAISO was pleased with the Proposed Decision findings at page 130 "that QFs of 1 MW or greater should be required to comply with the CAISO tariffs."

The CAISO is taking this opportunity to respond to the May 25, 2007 opening comments filed by the Cogeneration Association of California and the Energy Producers and Users Coalition (CAC/EPUC) to the extent CAC/EPUC took issue with the Proposed Decision's findings. In addition, the CAISO takes this opportunity to respond to comments filed by the California Wind Energy Association (CalWEA) concerning the applicability of the CAISO Tariff to wind resources and comments filed by Pacific Gas and Electric Company (PG&E) concerning the "firmness" of energy provided under future PURPA PPAs and whether "as available" energy should be counted towards a Load Serving Entity's resource adequacy obligations.

II. DISCUSSION

A. The Commission Should Reject CAC/EPUC Arguments that QFs Should Be Exempt from the CAISO Tariff.

At page 17 of its comments, CAC/EPUC argues that the Proposed Decision's finding that QFs be required to comply with the CAISO tariffs is inconsistent with the "must-take" status of QF energy. The CAISO disagrees. The currently effective CAISO Tariff and the revised CAISO Tariff to implement the CAISO's Market Redesign and Technology Upgrade (MRTU) project recognize a category of energy that is "must take"

and allows Scheduling Coordinators to schedule such energy as “must take.”¹ The CAISO has also developed a modified version of the Participating Generator Agreement (PGA) specifically for use by QFs, the QF-PGA, which has been accepted by the Federal Energy Regulatory Commission (FERC). Accordingly, there is nothing about the “must take” status of QF energy that is inherently inconsistent with the CAISO Tariff. Indeed, the CAISO Tariff grandfathered QF PURPA PPAs not because the energy was “must take,” but because the PURPA PPAs pre-existed the formation of the CAISO. The Proposed Decision recognizes this fact at page 130, and appropriately finds that “[n]ew contracts must explicitly take the existence of the CAISO and its tariff requirements into account.” In addition, the “must take” status of QF energy will evolve over time once Section 1253(a) of the Energy Policy Act of 2005 is made effective for California. Upon issuance of the required findings by FERC, Section 1253(a) would terminate the mandatory buy/sell requirement of Section 210 of PURPA thereby eliminating the “must take” status of QF energy going forward for any new PPAs entered into after that time.

CAC/EPUC also argues that Commission-jurisdictional Rule 21 interconnection process should be retained for QFs. Rule 21 applies to, and should only apply to, distribution level interconnections. To the extent QFs are interconnected at the distribution level, the Rule 21 process would be the appropriate process. However, QFs that seek to interconnect to the CAISO Controlled Grid, or modify an existing interconnection to the CAISO Controlled Grid, should be required to comply with the CAISO’s interconnection process set forth in Section 25 of the CAISO Tariff and in Appendix U of the CAISO Tariff, which contains the Standard Large Generator

¹ See definition of “Regulatory Must-Take Generation” in Appendix A of the CAISO Tariff and Sections 4.6.3.2 and 27.1.1.6.1 of the CAISO Tariff and the corresponding sections in the MRTU Tariff at Appendix A and Sections 4.6.3.2 and 31.4.

Interconnection Procedures. The CAISO's responsibilities under both state law (Cal. Pub. Util. Code §§ 334 et seq.) and the CAISO Tariff include the reliability of the CAISO Controlled Grid. The CAISO's interconnection process ensures the reliability and, in many cases, the deliverability of resources subject to new or upgraded interconnections. Accordingly, the CAISO urges the Commission to adopt the Proposed Decision's findings at page 130 to require QFs to comply with CAISO Tariff requirements.

B. QFs That are No Longer Subject to a Grandfathered PURPA PPA Are Subject to the CAISO Tariff

CalWEA argues that existing QFs that do not wish to enter into new agreements should be allowed to retain their existing interconnection arrangements even if they are no longer selling to the utility, or selling as a QF. (CalWEA p. 2.) Although the CAISO agrees that resources with pre-existing interconnections whose PURPA PPAs (or QF status) terminate should not necessarily be treated as new interconnections that would require a new interconnection application to the CAISO, these resources would be required to enter into all the necessary CAISO agreements, including an interconnection agreement and either a PGA or a QF-PGA to be permitted to enter into any wholesale energy transaction, as the CPUC would have no jurisdiction over these resources under PURPA in the absence of a PURPA PPA. The process applicable to such QFs is spelled out in CAISO Tariff Sections 25.1(d) and 25.1.2, which have been developed to implement and be consistent with FERC's uniform nationwide set of transmission interconnection standards. Pursuant to these sections, an existing project may not need a new Interconnection Study if the CAISO and the relevant Participating Transmission Owner confirm that the electrical characteristics of the QF would remain substantially

unchanged. In such case, however, the resource would nevertheless be required, under the CAISO Tariff, to enter into an interconnection agreement with the CAISO.

C. Firm Capacity QFs Should Continue Under Firm Capacity Contracts and “As-Available” Contracts Should Not Count for Resource Adequacy Purposes

In its opening comments at page 13, PG&E argues that “QFs who originally operated under firm capacity contracts and are able to provide firm capacity only be allowed to sign the proposed firm capacity contract” and, therefore, urges the Commission to modify the Proposed Decision insofar as it would permit QFs to choose between a “firm” contract and an “as available” contract. The CAISO agrees. In addition, to the extent the “As-Available” contract is an option for any QF, the CAISO does not believe that such contracts should count for purposes of a Load Serving Entity meeting its Commission imposed resource adequacy obligation. The objective of resource adequacy is to ensure that sufficient resources are available when and where needed to serve load reliably. A commercial arrangement that neither requires the resource to make itself available to the CAISO nor includes incentives for the resource to be available when needed to promote reliability fails to comport with the goal of resource adequacy.

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III. CONCLUSION

For the reasons stated above, the CAISO requests the Commission to adopt the Proposed Decision of ALJ Halligan as clarified by the modifications described herein.

Respectfully submitted,

/s/ **Sidney M. Davies**

Sidney M. Davies

Attorney for California Independent
System Operator Corporation

June 4, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic and United States mail, the Reply
Comments of the California Independent System Operator Corporation on Proposed
Decision of ALJ Halligan in Docket Nos. R.04-04-003 and R.04-04-025

Executed on June 4, 2007 at Folsom, California.

/s/ Charity N. Wilson

Charity N. Wilson

An Employee of the California
Independent System Operator

SERVICE LIST – R.04-04-003 and R.04-04-025

ANDREW B. BROWN
ELLISON, SCHNEIDER & HARRIS, LLP
abb@eslawfirm.com

ANDREW J. VAN HORN
VAN HORN CONSULTING
andy.vanhorn@vhcenergy.com

Amy C. Yip-Kikugawa
CALIF PUBLIC UTILITIES COMMISSION
ayk@cpuc.ca.gov

BARRY LOVELL
BERRY PETROLEUM COMPANY
bjl@bry.com

BARBARA R. BARKOVICH
BARKOVICH & YAP, INC.
brbarkovich@earthlink.net

Carol A. Brown
CALIF PUBLIC UTILITIES COMMISSION
cab@cpuc.ca.gov

CALIFORNIA ENERGY MARKETS
cem@newsdata.com

CHRIS KING
CALIFORNIA CONSUMER EMPOWERMENT
chris@emeter.com

LAW DEPARTMENT FILE ROOM
PACIFIC GAS AND ELECTRIC COMPANY
cpuccases@pge.com

DAVID SAUL
SOLEL, INC.
david.saul@solel.com

DAVID L. HUARD
MANATT, PHELPS & PHILLIPS, LLP
dhuard@manatt.com

DOUGLAS K. KERNER
ELLISON, SCHNEIDER & HARRIS, LLP
dkk@eslawfirm.com

DANIEL W. DOUGLASS
DOUGLASS & LIDDELL
dougllass@energyattorney.com

DON WOOD
PACIFIC ENERGY POLICY CENTER
dwood8@cox.net

EVELYN KAHL
ALCANTAR & KAHL, LLP
ek@a-klaw.com

EDWARD J TIEDEMANN
KRONICK MOSKOVITZ TIEDEMANN AND GIRARD
etiedemann@kmtg.com

JOHN C. GABRIELLI
GABRIELLI LAW OFFICE
gabrielliclaw@sbcglobal.net

Robert Kinoshian
CALIF PUBLIC UTILITIES COMMISSION
gig@cpuc.ca.gov

HOWARD W. CHOY
LOS ANGELES COUNTY ISD, FACILITIES OPERA
hchoy@isd.co.la.ca.us

ERIC J. ISKEN
SOUTHERN CALIFORNIA EDISON COMPANY
j.eric.isken@sce.com

ANN G. GRIMALDI
MCKENNA LONG & ALDRIDGE LLP
agrimaldi@mckennalong.com

ALAN NOGEE
UNION OF CONCERNED SCIENTISTS
anogee@ucsusa.org

BRIAN T. CRAGG
GOODIN MACBRIDE SQUERI RITCHIE & DAY
bcragg@goodinmacbride.com

BRADLEY MEISTER
CALIFORNIA ENERGY COMMISSION
bmeister@energy.state.ca.us

BRIAN THEAKER
WILLIAMS POWER COMPANY
brian.theaker@williams.com

Steve Linsey
CALIF PUBLIC UTILITIES COMMISSION
car@cpuc.ca.gov

CENTRAL FILES
SAN DIEGO GAS & ELECTRIC
centralfiles@semptrautilities.com

CHRISTOPHER J. MAYER
MODESTO IRRIGATION DISTRICT
chrism@mid.org

CAROL A. SMOOTS
PERKINS COIE LLP
csmoots@perkinscoie.com

DAN L. CARROLL
DOWNEY BRAND, LLP
dcarroll@downeybrand.com

DIANE I. FELLMAN
LAW OFFICE OF DIANE I. FELLMAN
diane_fellman@fpl.com

Don Schultz
CALIF PUBLIC UTILITIES COMMISSION
dks@cpuc.ca.gov

DESPINA PAPAPOSTOLOU
SAN DIEGO GAS AND ELECTRIC COMPANY
dpapapostolou@semptrautilities.com

DONALD SCHOENBECK
RCS, INC.
dws@r-c-s-inc.com

ERIC LARSEN
RCM DIGESTERS
elarsen@rcmdigesters.com

EDWARD V. KURZ
PACIFIC GAS AND ELECTRIC COMPANY
evk1@pge.com

GARY L. ALLEN
SOUTHERN CALIFORNIA EDISON
gary.allen@sce.com

GREGG MORRIS
GREEN POWER INSTITUTE
gmorris@emf.net

ANDREW HOERNER
REDEFINING PROGRESS
hoerner@redefiningprogress.org

JANET COMBS
SOUTHERN CALIFORNIA EDISON COMPANY
janet.combs@sce.com

ALEXANDRE B. MAKLER
CALPINE CORPORATION
alexm@calpine.com

ANN L. TROWBRIDGE
DAY CARTER MURPHY LLC
atrowbridge@daycartermurphy.com

BERJ K. PARSEGHIAN
SOUTHERN CALIFORNIA EDISON COMPANY
berj.parseghian@sce.com

ROBERT B. GEX
DAVIS WRIGHT TREMAINE LLP
bobgex@dwtr.com

BRIAN HANEY
UTILITY SYSTEM EFFICIENCIES, INC.
brianhaney@useconsulting.com

CARLO ZORZOLI
ENEL NORTH AMERICA, INC.
carlo.zorzoli@enel.it

Charlyn A. Hook
CALIF PUBLIC UTILITIES COMMISSION
chh@cpuc.ca.gov

CHUCK MANZUK
SAN DIEGO GAS AND ELECTRIC COMPANY
cmanzuk@semptrautilities.com

CURTIS KEBLER
GOLDMAN, SACHS & CO.
curtis.kebler@gs.com

DAVID MORSE
demorse@omsoft.com

CHRIS ANN DICKERSON, PHD
FREEMAN, SULLIVAN & CO.
dickerson06@fscgroup.com

DOUGLAS MCFARLAN
MIDWEST GENERATION EME
dmcfarlan@mwgen.com

DAVID REYNOLDS
ASPEN SYSTEMS CORPORATION
dreynolds@aspensys.com

EDWARD C. REMEDIOS
ecrem@ix.netcom.com

ED LUCHA
PACIFIC GAS AND ELECTRIC COMPANY
ell5@pge.com

KAREN TERRANOVA
ALCANTAR & KAHL, LLP
filings@a-klaw.com

GEORGETTA J. BAKER
SAN DIEGO GAS & ELECTRIC/SOCAL GAS
gbaker@sempra.com

GRANT A. ROSENBLUM
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
grosenblum@caiso.com

RICHARD D. ELY
DAVIS HYDRO
hydro@davis.com

JANICE LIN
STRATEGEN CONSULTING LLC
janice@strategenconsulting.com

ARTHUR L. HAUBENSTOCK
PACIFIC GAS AND ELECTRIC COMPANY
alh@pge.com

ANDREW ULMER
CALIFORNIA DEPARTMENT OF WATER
RESOURCES
aulmer@water.ca.gov

WILLIAM B. MARCUS
JBS ENERGY, INC.
bill@jbsenergy.com.

WILLIAM E. POWERS
POWERS ENGINEERING
bpowers@powersengineering.com

WILLIAM P. SHORT
RIDGEWOOD POWER MANAGEMENT, LLC
bshort@ridgewoodpower.com

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
case.admin@sce.com

CHRISTOPHER HILEN
SIERRA PACIFIC POWER COMPANY
chilen@sppc.com

CRYSTAL NEEDHAM
EDISON MISSION ENERGY
cneedham@edisonmission.com

DANIEL A. KING
SEMPRA ENERGY RESOURCES
daking@sempra.com

DANIEL V. GULINO
RIDGEWOOD POWER MANAGEMENT, LLC
dgulino@ridgewoodpower.com

Donna J. Hines
CALIF PUBLIC UTILITIES COMMISSION
djh@cpuc.ca.gov

DOUG DAVIE
DAVIE CONSULTING, LLC
dougdpucmail@yahoo.com

DEVRA WANG
NATURAL RESOURCES DEFENSE COUNCIL
dwang@nrdc.org

J.A. SAVAGE
CALIFORNIA ENERGY CIRCUIT
editorial@californiaenergycircuit.net

CHARLES R. MIDDLEKAUFF
PACIFIC GAS & ELECTRIC COMPANY LAW DEPT.
ermd@pge.com

MATTHEW FREEDMAN
THE UTILITY REFORM NETWORK
freedman@turn.org

GREG BASS
SEMPRA ENERGY SOLUTIONS
gbass@semprasolutions.com

GRACE LIVINGSTON-NUNLEY
PACIFIC GAS AND ELECTRIC COMPANY
gx12@pge.com

IRENE M. STILLINGS
CALIFORNIA CENTER FOR SUSTAINABLE
ENERGY
irene.stillings@energycenter.org

JOSEPH B. WILLIAMS
MCDERMOTT WILL & EMERGY LLP
jbwilliams@mwe.com

SERVICE LIST – R.04-04-003 and R.04-04-025

JEFFREY P. GRAY
DAVIS WRIGHT TREMAINE LLP
jeffgray@dwt.com

E. JESUS ARREDONDO
NRG ENERGY, INC.
jesus.arredondo@nrgenergy.com

JOHN GALLOWAY
UNION OF CONCERNED SCIENTISTS
jgalloway@ucsusa.org

JANET DOYLE
KRAMER JUNCTION COMPANY
jheckdoyle@aol.com

JAMES ROSS
RCS INC.
jimross@r-c-s-inc.com

JOSEPH M. KARP
WINSTON & STRAWN LLP
jkarp@winston.com

JOSEPH KLOBERDANZ
SAN DIEGO GAS & ELECTRIC COMPANY
jkloberdanz@sempraulilities.com

JOHN W. LESLIE
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
jleslie@luce.com

JIM MCARTHUR
ELK HILLS POWER, LLC
jmcARTHUR@elkhills.com

Julie Halligan
CALIF PUBLIC UTILITIES COMMISSION
jmh@cpuc.ca.gov

Jerry Oh
CALIF PUBLIC UTILITIES COMMISSION
joh@cpuc.ca.gov

JOY A. WARREN
MODESTO IRRIGATION DISTRICT
joyw@mid.org

JANINE L. SCANCARELLI
FOLGER, LEVIN & KAHN, LLP
jscancarelli@flk.com

JOY C. YAMAGATA
SAN DIEGO GAS & ELECTRIC/SOCALGAS
jyamagata@sempraulilities.com

KENNETH E. ABREU
k.abreu@sbcglobal.net

KAREN LINDH
LINDH & ASSOCIATES
karen@klindh.com

KATHERINE RYZHAYA
PACIFIC GAS & ELECTRIC COMPANY
karp@pge.com

KAREN BOWEN
WINSTON & STRAWN LLP
kbowen@winston.com

KEVIN WOODRUFF
WOODRUFF EXPERT SERVICES, INC.
kdw@woodruff-expert-services.com

KEITH W. MELVILLE
SEMPRA ENERGY
kmelville@sempra.com

AVIS KOWALEWSKI
CALPINE CORPORATION
kowalewskia@calpine.com

Karen P. Paull
CALIF PUBLIC UTILITIES COMMISSION
kpp@cpuc.ca.gov

KRIS G. CHISHOLM
CALIFORNIA ELECTRICITY OVERSIGHT BOARD
kris.chisholm@eob.ca.gov

LYNNE BROWN
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
l_brown369@yahoo.com

LAURA GENAO
SOUTHERN CALIFORNIA EDISON COMPANY
laura.genao@sce.com

DONALD C. LIDDELL, P.C.
DOUGLASS & LIDDELL
liddell@energyattorney.com

LISA M. DECKER
CONSTELLATION ENERGY GROUP, INC.
lisa.decker@constellation.com

LIZBETH MCDANNELL
lizbeth.mcdannel@sce.com

LAWRENCE KOSTRZEWA
EDISON MISSION ENERGY
lkostorzewa@edisonmission.com

MARY A. GANDESBERY
PACIFIC GAS AND ELECTRIC COMPANY
magq@pge.com

Marion Peleo
CALIF PUBLIC UTILITIES COMMISSION
map@cpuc.ca.gov

MARK J. SMITH
FPL ENERGY
mark_j.smith@fpl.com

MAUREEN LENNON
CALIFORNIA COGENERATION COUNCIL
maureen@lennonassociates.com

MARGARET D. BROWN
PACIFIC GAS AND ELECTRIC COMPANY
mdbk@pge.com

MARC D. JOSEPH
ADAMS, BROADWELL, JOSEPH & CARDOZO
mdjoseph@adamsbroadwell.com

MAURICE CAMPBELL
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
mecsoft@pacbell.net

MARC KOLB
PACIFIC GAS AND ELECTRIC COMPANY
mekd@pge.com

MICHEL PETER FLORIO
THE UTILITY REFORM NETWORK (TURN)
mflorio@turn.org

MICHAEL J. GIBBS
ICF CONSULTING
mgibbs@icfconsulting.com

MARK HARRER
mharrer@sbcglobal.net

MICHAEL A. BACKSTROM
SOUTHERN CALIFORNIA EDISON COMPANY
michael.backstrom@sce.com

MICHAEL E. BOYD
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
michaelboyd@sbcglobal.net

MICHAEL JASKE
CALIFORNIA ENERGY COMMISSION
mjaske@energy.state.ca.us

Matthew Deal
CALIF PUBLIC UTILITIES COMMISSION
mjd@cpuc.ca.gov

Mikhail Haramati
CALIF PUBLIC UTILITIES COMMISSION
mkh@cpuc.ca.gov

MARY ANN MILLER
CALIFORNIA ENERGY COMMISSION
mmiller@energy.state.ca.us

MICHAEL ALCANTAR
ALCANTAR & KAHL, LLP
mpa@a-klaw.com

MARK R. HUFFMAN
PACIFIC GAS AND ELECTRIC COMPANY
mrh2@pge.com

MRW & ASSOCIATES, INC.
mrw@mrwassoc.com

Merideth Sterkel
CALIF PUBLIC UTILITIES COMMISSION
mts@cpuc.ca.gov

MICHAEL A. YUFFEE
MCDERMOTT WILL & EMERY LLP
myuffee@mwe.com

Noel Obiora
CALIF PUBLIC UTILITIES COMMISSION
nao@cpuc.ca.gov

NINA BUBNOVA
PACIFIC GAS AND ELECTRIC COMPANY
nbb2@pge.com

NORA SHERIFF
ALCANTAR & KAHL, LLP
nes@a-klaw.com

NANCY RADER
CALIFORNIA WIND ENERGY ASSOCIATION
nrader@calwea.org

PATRICK MCDONNELL
AGLAND ENERGY SERVICES, INC.
pcmcdonnell@earthlink.net

JANIS C. PEPPER
CLEAN POWER MARKETS, INC.
pepper@cleanpowermarkets.com

PETER W. HANSCHEN
MORRISON & FOERSTER, LLP
phansch@mofo.com

PHILIP HERRINGTON
EDISON MISSION ENERGY
pherrington@edisonmission.com

W. PHILLIP REESE
CALIFORNIA BIOMASS ENERGY ALLIANCE, LLC
phil@reesechambers.com

PATRICK HOLLEY
COVANTA ENERGY CORPORATION
pholley@covantaenergy.com

Peter Lai
CALIF PUBLIC UTILITIES COMMISSION
ppl@cpuc.ca.gov

PAUL M. SEBY
MCKENNA LONG & ALDRIDGE LLP
pseby@mckennalong.com

RANDALL W. KEEN
MANATT, PHLEPS & PHILLIPS, LLP
pucservice@manatt.com

SHAWN SMALLWOOD, PH.D.
puma@davis.com

ALAN PURVES
CALIFORNIA LANDFILL GAS COALITION
purses@grslc.net

RALPH E. DENNIS
FELLON-MCCORD & ASSOCIATES
ralph.dennis@constellation.com

REN ORENS
ENERGY AND ENVIRONMENTAL ECONOMICS
ren@ethree.com

ANNE FALCON
EES CONSULTING, INC.
rfp@eesconsulting.com

RICK NOGER
PRAXAIR PLAINFIELD, INC.
rick_noger@praxair.com

RICHARD LAUCKHART
HENWOOD ENERGY SERVICES, INC.
rlauckhart@henwoodenergy.com

Robert L. Strauss
CALIF PUBLIC UTILITIES COMMISSION
rls@cpuc.ca.gov

RICHARD MCCANN
M.CUBED
rmccann@umich.edu

ROGER BERLINER
BERLINER LAW PLLC
roger@berlinerlawpllc.com

RASHA PRINCE
SAN DIEGO GAS & ELECTRIC
rprince@sempraulilities.com

ROD AOKI
ALCANTAR & KAHL, LLP
rsa@a-klaw.com

REED V. SCHMIDT
BARTLE WELLS ASSOCIATES
rschmidt@bartlewells.com

ROBERT SHAPIRO
CHADBOURNE & PARKE LLP
rshapiro@chadbourne.com

RON WETHERALL
CALIFORNIA ENERGY COMMISSION
rwetherall@energy.state.ca.us

SAM HITZ
CALIFORNIA CLIMATE ACTION REGISTRY
sam@climateregistry.org

SERVICE LIST – R.04-04-003 and R.04-04-025

ROBERT SARVEY
sarveybob@aol.com

Shannon Eddy
CALIF PUBLIC UTILITIES COMMISSION
sed@cpuc.ca.gov

Sepideh Khosrowjah
CALIF PUBLIC UTILITIES COMMISSION
skh@cpuc.ca.gov

STEVEN F. GREENWALD
DAVIS WRIGHT TREMAINE, LLP
stevegreenwald@dwt.com

Thomas Roberts
CALIF PUBLIC UTILITIES COMMISSION
trc@cpuc.ca.gov

TIMOTHY R. ODIL
MCKENNA LONG & ALDRIDGE LLP
todil@mckennalong.com

VALERIE J. WINN
PACIFIC GAS AND ELECTRIC COMPANY
vjw3@pge.com

JAMES WOODRUFF
SOUTHERN CALIFORNIA EDISON COMPANY
woodruijb@sce.com

TANDY MCMANNES
SOLAR THERMAL ELECTRIC ALLIANCE
101 OCEAN BLUFFS BLVD.APT.504
JUPITER, FL 33477-7362

SHIRLEY WOO
PACIFIC GAS AND ELECTRIC COMPANY
saw0@pge.com

RICHARD M. ESTEVES
SESCO, INC.
sesco@optonline.net

STEVEN A. LEFTON
APTECH ENGINEERING SERVICES INC.
slefton@aptecheng.com

STEVEN A. GREENBERG
DISTRIBUTED ENERGY STRATEGIES
steveng@destrategies.com

Theresa Cho
CALIF PUBLIC UTILITIES COMMISSION
tcx@cpuc.ca.gov

TOM BEACH
CROSSBORDER ENERGY
tomb@crossborderenergy.com

VIKKI WOOD
SACRAMENTO MUNICIPAL UTILITY DISTRICT
vwood@smud.org

Wade McCartney
CALIF PUBLIC UTILITIES COMMISSION
wsm@cpuc.ca.gov

Susannah Churchill
CALIF PUBLIC UTILITIES COMMISSION
sc1@cpuc.ca.gov

STACIE FORD
CALIFORNIA ISO
sford@caiso.com

SNULLER PRICE
ENERGY AND ENVIRONMENTAL ECONOMICS
snuller@ethree.com

TOM JARMAN
PACIFIC GAS AND ELECTRIC COMPANY
taj8@pge.com

Terrie D. Prosper
CALIF PUBLIC UTILITIES COMMISSION
tdp@cpuc.ca.gov

TOM SKUPNJAK
CPG ENERGY
toms@i-cpg.com

WILLIAM H. BOOTH
LAW OFFICES OF WILLIAM H. BOOTH
wbooth@booth-law.com

WILLIAM W. WESTERFIELD III
ELLISON, SCHNEIDER & HARRIS LLP
www@eslawfirm.com

SCOTT J. ANDERS
UNIVERSITY OF SAN DIEGO SCHOOL OF LAW
scottanders@sandiego.edu

Sudheer Gokhale
CALIF PUBLIC UTILITIES COMMISSION
skg@cpuc.ca.gov

SARA STECK MYERS
LAW OFFICES OF SARA STECK MYERS
ssmyers@att.net

Traci Bone
CALIF PUBLIC UTILITIES COMMISSION
tbo@cpuc.ca.gov

TIM HEMIG
NRG ENERGY, INC.
tim.hemig@nrgenergy.com

TORY S. WEBER
SOUTHERN CALIFORNIA EDISON COMPANY
tory.weber@sce.com

BARBARA GEORGE
WOMEN'S ENERGY MATTERS
wem@igc.org

ANAN H. SOKKER
CHADBOURNE & PARKE LLP
1200 NEW HAMPSHIRE AVE. NW
WASHINGTON, DC 20036